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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

STUDENT DOE #1,
Plaintiff,
v.

KRISTI NOEM, in her official capacity
as Secretary of Homeland Security; *et*
al.,
Defendants.

No. 5:25-cv-00847-SSS-SHK

**DEFENDANTS' NOTICE OF
DECLARATION OF ANDRE WATSON
RE: IMPLEMENTATION OF NEW ICE
POLICY**

Hearing Date: May 9, 2025
Hearing Time: 2:00 p.m.
Ctrm: Courtroom 2 (Zoom)

Honorable Sunshine S. Sykes
United States District Judge

1 Defendants respectfully submit the attached Declaration of Andre Watson, Senior
2 Official within the National Security Division (NSD) for Homeland Security
3 Investigations, updating the Court on how ICE is implementing the new policy
4 concerning SEVIS records, including the reactivation of the SEVIS record of the
5 Plaintiff in this lawsuit.

6 Mr. Watson's declaration states that ICE has no plans under its new policy to re-
7 terminate Plaintiff's SEVIS record based solely on the National Crime Information
8 Center (NCIC) record that led to its initial termination. Moreover, Mr. Watson's
9 declaration explains that ICE's reactivation of Plaintiff's SEVIS record is retroactive to
10 the date of its initial termination. That means there is no gap in Plaintiff's SEVIS record.

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12 Dated: May 7, 2025

Respectfully submitted,

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18 /s/ Paul (Bart) Green
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